

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

POWER UP LENDING GROUP, LTD.,

X

Case No.: 2:17 –cv-5749
(LDW)(ARL)

Plaintiff(s),

-against-

DEFENDANT'S
INITIAL DISCLOSURE

FBEC WORLDWIDE INC.,

Defendant(s),

X

Defendant, FBEC Worldwide, Inc., as and for its initial disclosure pursuant to FRCP
Rule 26(a)(1), shows and alleges as follows:

- i. The name, address and telephone number of the individuals likely to have discoverable information in this action are Jeffrey Greene, 1621 Central Avenue Cheyenne, Wyoming 82001, 1-800-785-4089.
- ii. A description by category and location of the documents that the defendant has in its possession that would support its claim are as follows:
 - a. The Convertible Promissory Note dated January 23, 2017; and the Second Note dated February 15, 2017;
 - b. Emails between Defendant, Plaintiff and Plaintiff's representatives.

The foregoing documents are in the possession of all parties hereto.

- iii. A computation of all damage is not yet complete.
- iv. There are no business insurance policies that would be applicable to this matter.

Dated: New York, New York
February 28, 2018

Respectfully Submitted,



Lorraine M. Medeiros, Esq.
Attorney for Defendant,
56 Ferry Street, Suite 1,
Newark, New Jersey 07105
T: 973-589-1785
F: 973-589-0603

1180 Avenue of the Americas
8th Floor
New York, New York 10036

TO: Richard S. Naidich (RSN-4102)
Naidich Wurman, LLP
111 Great Neck Road, Suite 214
Great Neck, New York 11021
(516) 498-2900